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*Attorneys for Defendants*

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 OAKLAND DIVISION

14 ZOYA KOVALENKO,

15 Plaintiff,

16 v.

17 KIRKLAND & ELLIS LLP, MICHAEL DE  
18 VRIES, MICHAEL W. DE VRIES, P.C.,  
19 ADAM ALPER, ADAM R. ALPER, P.C.,  
20 AKSHAY DEORAS, AKSHAY S.  
DEORAS, P.C., AND MARK FAHEY,

21 Defendants.

Case No. 4:22-cv-05990-HSG (TSH)

**JOINT ADMINISTRATIVE MOTION TO  
PERMIT NON-PUBLIC DISCUSSIONS  
DURING APRIL 18, 2025 DISCOVERY  
HEARING**

Re: Dkt. No. 215

Assigned to the Honorable Haywood S. Gilliam,  
Jr., United States District Judge for the United  
States District Court for the Northern District of  
California, Oakland Division

Referred to the Honorable Thomas S. Hixson,  
United States Magistrate Judge for the United  
States District Court for the Northern District of  
California, San Francisco Division

Hearing scheduled for April 18, 2025 at 10:00  
am, before Judge Hixson, at the San Francisco  
Courthouse, 15th Floor, Courtroom E, 450  
Golden Gate Avenue, San Francisco, California  
94102, via Zoom.

1 Pursuant to Civil Local Rule 7-11, Plaintiff Zoya Kovalenko and Defendants Kirkland &  
2 Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C.,  
3 Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively, “Defendants”) (Plaintiff  
4 and Defendants collectively, the “Parties”) hereby file the instant joint administrative motion  
5 requesting the Court permit non-public discussions to the extent it becomes necessary during the  
6 discovery hearing scheduled for this Friday, April 18, 2025, at 10:00 am before the Honorable  
7 Judge Hixson. *See* Clerk’s Not. Setting Zoom Telephonic Disc. Hr’g (Apr. 15, 2025), Dkt. No. 215  
8 (setting discovery hearing for April 18, 2025 as Zoom telephonic conference).

9 As Judge Gilliam noted in his Order dated March 26, 2025, “[t]o the extent the Court  
10 determines that any targeted *in camera* discussions are warranted, the Court may utilize Zoom’s  
11 ‘breakout room’ function to conduct such discussions.” Order at 2, Dkt. No. 205. The Parties  
12 anticipate that *in camera* discussions may be warranted at the April 18 discovery hearing because  
13 the subpoena dispute at issue involves confidential information. Kovalenko Decl. ¶¶ 4–6; *U.S.*  
14 *E.E.O.C. v. ABM Indus. Inc.*, No. 1:07-cv-01428 LJO JLT, 2010 WL 582049, at \*1–2 (E.D. Cal.  
15 Feb. 12, 2010). Thus, the Parties respectfully request that, to the extent necessary, the Court grant  
16 this Joint Administrative Motion permitting non-public *in-camera* discussions during the hearing.

1 Dated: April 17, 2025

ZOYA KOVALENKO

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3  
4 By: s/Zoya Kovalenko  
5 Zoya Kovalenko  
6 *Attorney for Plaintiff Zoya Kovalenko*

7 Dated: April 17, 2025

JOSEPH C. LIBURT  
Orrick, Herrington & Sutcliffe LLP

8  
9 By: /s/ Joseph C. Liburt  
10 Joseph C. Liburt  
11 *Attorneys for Defendants*

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14  
15  
16 **Attestation Regarding Electronic Signatures**

17 I, Zoya Kovalenko, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other  
18 signatories to this document, on whose behalf this filing is submitted, concur in the filing's  
19 content and have authorized this filing. I declare under penalty of perjury under the laws of the  
20 United States of America that the foregoing is true and correct.

21 Dated: April 17, 2025

22 s/Zoya Kovalenko  
Zoya Kovalenko